



Commercial Fishermen of Santa Barbara, Inc. 6 Harbor Way, #155 Santa Barbara, CA 93109 [www.cfsb.info](http://www.cfsb.info)

January 18, 2011

Valerie Termini  
California Ocean Protection Council  
1330 Broadway, 13th floor  
Oakland, CA 94612

**RE: Comments on California Sustainable Seafood Initiative – Phase I**

Dear Ms. Termini and OPC staff,

Commercial Fishermen of Santa Barbara, Inc. (CFSB) is a community-based fisheries organization dedicated to providing fresh local sustainable seafood to our regional communities. Our members use net, trap, dive and hook and line harvesting methods for a broad range of seafood we provide to local communities. Our goals are to improve economic and biological sustainability of our fisheries and to maintain California's fishing heritage by integrating regional efforts to improve co-management of our fishing communities, collaborating in resource monitoring protocols, implementing effective stock assessment data collection, supporting socioeconomic studies of our fisheries, and adding value to our seafood products while ensuring the sustainability of our resources.

We appreciate the opportunity provided by the Ocean Protection Council (OPC) to comment on the Phase I draft protocol of the California Sustainable Seafood Initiative (CSSI). While we very much appreciate the intent, we have serious reservations with the direction the program is going.

CFSB is in favor of using the Marine Stewardship Council (MSC) certification process, with the exception of the substantial expense of the certifications. California currently has some of the strictest fishing regulations, best managed fisheries, largest areas of Marine Protected Areas (MPAs), cleanest waters, highly productive marine resources and greatest environmental protection in the world, and the fishing industry has yet to see any marketing and economical benefits from those restrictions and benefits. Everlasting fishery resources are the fishermen's biggest incentive to follow sustainable fishing practices, not 'eco-labels.' The market-based strategies that are proposed in the CSSI protocol does not incentivize sustainable fishing practices or ensure a more profitable product. The strategies do make California sustainable seafood more expensive and less accessible to the consumers. Most of California's fisheries cannot afford a MSC pre-assessment, let alone a MSC full-assessment of their fisheries. While it is understood that the

OPC will help fisheries fund these certifications, the CSSI program is not currently set up to sustain itself, and follow through with the certifications of California fisheries. The ultimate costs of the certifications will be put on the fishermen who are already struggling to compete with foreign seafood imports, increasing concentrations of displaced fishermen in the open access areas and the demand for reliability and consistency in the seafood consumer industry. In addition, the fisheries that cannot afford the certifications, or sustain the certifications, due to an expensive renewal process, may be penalized if consumers assume a fishery is not sustainable simply because it does not have an 'eco-label.'

If the CSSI program intends to support California coastal communities and implement the parameters in which a fishery is considered 'sustainable' by CSSI definition, and implement the Plus California Standards of traceability, then the OPC should fund projects other than just the certifications. The OPC needs to assist and provide funding for fisheries in order to gain the qualifications needed for a sustainable certification. It is essential that the OPC support coastal fishery communities and the projects that will provide the means to develop the infrastructure required to maintain seafood supply keep revenues in California, boost product value, create jobs, increase local sustainable seafood accessibility, heighten awareness, promote outreach and reduce the energy consumption from our role in the global seafood trade. There is a huge need for better education and appreciation of the health, economic and environmental benefits of choosing to support our California seafood industry. Unless we are proactive in creating the means to provide support for our fishing industry, this opportunity will be lost.

CFSB is also not onboard with the CSSI traceability component of fish toxicity associated with consumption. Fish toxicity has nothing to do with sustainability of our fisheries resources, and will only hurt the marketability of California seafood. Toxicity in food affects different people at different levels. All toxins have a safe threshold below which there is no toxicity. It is a common mistake, based on fear and misinformation, to believe that a toxin has a linear toxic effect down to the lowest levels. In fact, below a safe threshold toxicity disappears, and there is no toxicity. All metals are present in the earth's crust and enter our bodies continuously at low levels—in the air we breathe, in the food we eat and in the water we drink. It is not possible to totally eliminate all exposure. Other unsustainable, foreign seafood products will not contain this information, and people may assume it is safe if there is no toxicity warning indicated. This misinformation leads to confusion of what is safe to eat. The fishing industry will bear the loss of jobs while the negative connotations associated with an imprecise, ill defined toxicity measure will poison confidence in California sustainable seafood. Consumers and the fishing industry will suffer as a consequence of negative alarmist marketing.

Before the CSSI program is implemented, an overview of California seafood supply and demand needs to be conducted. The supply analysis needs to consist of California fisheries, defined by species, and determine the demand for California sustainable seafood in restaurants, dining

services, grocers and consumers. Before any market-based strategies are implemented we need to know where our California seafood is going, what seafood is imported, and why. Surveys and outreach need to be completed in order to know if consumers care about or are aware of sustainable seafood, and if they are willing to pay more for a seafood products with 'eco-labels.'

The protocol of the CSSI must ensure the California fishery industries will incur no negative economic impact. Again, CFSB appreciates the opportunity to comment on this CSSI draft protocol, and is available to help address the issues noted above.

Sincerely,



Stephanie Mutz, Research Coordinator



Harry Liquornik, President